

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

COALITION FOR INDEPENDENT
TECHNOLOGY RESEARCH,

Plaintiff,

v.

No. 1:23-cv-00783

GREG ABBOTT, in his official capacity
as Governor of the State of Texas,
STEVEN C. MCCRAW, in his official
capacity as Director and Colonel of the
Texas Department of Public Safety,
AMANDA CRAWFORD, in her official
capacity as Executive Director of the
Texas Department of Information
Resources and Chief Information Officer
of Texas, DALE RICHARDSON, in his
official capacity as Chief Operations
Officer of the Texas Department of
Information Resources, ASHOK MAGO,
LAURA WRIGHT, LINDY RYDMAN,
CARLOS MUNGUIA, MARY DENNY,
MILTON B. LEE, MELISA DENIS,
DANIEL FEEHAN, and JOHN SCOTT,
JR., in their official capacities as members
of the Board of Regents of the University
of North Texas System, and MICHAEL
WILLIAMS, in his official capacity as
Chancellor of the University of North
Texas System,

Defendants.

DEFENDANTS' OPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS

Defendants ask this Court for leave to file a 37-page opposition to Plaintiff's motion for a preliminary injunction, a copy of which is filed with this motion. This case involves Texas's partial ban of the social media application, TikTok, due to national security concerns. Texas requests additional pages in part so it can explain why TikTok is a national security threat and adequately brief the important and novel legal issues implicated by Plaintiff's motion. Also notable, Plaintiff: (1) does not

have Article III standing for most of its claims, and Defendants need to explain why; (2) applied the wrong First Amendment standard in its opening motion, and Defendants need to explain why; and (3) filed 156 pages' worth of declarations in connection with its motion for injunctive relief, some of which warrant a substantive response.

Thus, Defendants request a short page-limit extension for its opposition to Plaintiff's motion for a preliminary injunction. We thank the Court for its time and attention to this matter.

Date: October 23, 2023

Respectfully submitted,

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Attorney General of Texas

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/s/ Todd Dickerson
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COUNSEL FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I certify that on October 12, 2023, I conferred with Plaintiff's counsel, Jameel Jaffer, via email regarding the subject of this motion. He stated that he opposes this motion. The parties' full exchange on this issue is attached as **Exhibit A**.

/s/ Todd Dickerson

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2023, a true and correct copy of the foregoing instrument has been served electronically through the electronic-filing manager to:

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/s/ Todd Dickerson